

**UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
PENNSYLVANIA**

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TOVA GANZ

Plaintiff

v.

NHS HUMAN SERVICES, INC., f/k/a  
THE NORTHWESTERN  
CORPORATION, NHS, INC., NHS II  
PROPERTIES, LLC  
NHS III PROPERTIES, LLC, NHS  
HUMAN SERVICES FOUNDATION,  
THE FUTURES HEALTHCARE, LLC,  
and THE FUTURES EDUCATION OF  
MICHIGAN, LLC

Defendants.

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**NOTICE OF REMOVAL OF ACTION**

Defendants, NHS Human Services, Inc.; NHS, Inc.; NHS II Properties, LLC; NHS III Properties, LLC; and NHS Human Services Foundation (together, “NHS Defendants”), by and through their counsel, Burns White LLC, hereby gives Notice of Removal to this Honorable Court of a state civil action filed in the Court of Common Pleas of Philadelphia County, Pennsylvania, and in support thereof aver as follows:

1. A civil action has been brought against NHS Defendants by Plaintiff and is pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, docketed at No. 2016-01454. *A true and correct copy of Plaintiff’s civil action is attached hereto and marked as Exhibit “A”.*

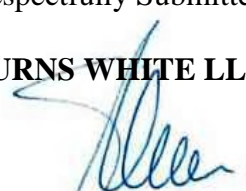
2. The state court in which this action was filed is located in Philadelphia County, Pennsylvania. *See Exhibit “A”.* Philadelphia County, Pennsylvania is located in the Eastern District of Pennsylvania.

3. Plaintiff is a resident of the State of New York. *See Exhibit "A"*.
4. The NHS Defendants are, and were at the time of the filing of this action, are citizens of the Commonwealth of Pennsylvania.
5. Co-Defendants are citizens of the State of Michigan. *See Exhibit "A"*.
6. The Defendants in this action were served with this Complaint at their principal places of business. *See Exhibit "A"*.
7. This action is for a matter in controversy which will be in excess of the sum or value of \$75,000, exclusive of interests and costs.<sup>1</sup>
8. Had this action been brought initially in this Court, this Court would have had original jurisdiction over the subject matter pursuant to 28 U.S.C. § 1332.
9. The Complaint in this action was served on the NHS Defendants on or about December 8, 2016. *See a true and correct copy of the Certificate of Service, attached hereto and marked as Exhibit "B"*. The instant petition is filed within thirty days thereof as required under 28 U.S.C. § 1446(b).
10. The statutory requirements having been met, this state civil action is properly removed to this Court.

Respectfully Submitted,

**BURNS WHITE LLC**

By:

  
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Stuart T. O'Neal, Esquire  
Anne Schmidt Frankel, Esquire  
*Attorneys for NHS Defendants*

Date: January 4, 2017

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<sup>1</sup> Plaintiff pleads merely that their claims for damages are in excess of Pennsylvania's arbitration limits of \$50,000, but alleges severe physical and emotional damages, both temporary and permanent, and including lost past, present, and future earnings and loss of life's pleasures, all of which will reasonably exceed an amount of \$75,000. *See Exhibit "A"*.